

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

IN RE:

LUZ CARMARIE RODRIGUEZ FIGUEROA

DEBTOR

CASE NO. 19-05439/EAG

CHAPTER 13

**DEBTOR'S MOTION REQUESTING ORDER
RE: AUTHORIZATION TO USE OF FUNDS FROM 2022 TAX REFUND**

TO THE HONORABLE COURT:

NOW COMES, LUZ CARMARIE RODRIGUEZ FIGUEROA, Debtor, through the undersigned attorney, and very respectfully states and prays as follows:

1. The Debtor's confirmed *Chapter 13 Plan* dated November 8, 2019, Docket No. 14, provides that the Debtor's tax refunds will be paid into the Plan, in the above captioned case.
2. The Debtor received the 2022 tax refund in the amount of \$1,544.00. Attached is copy of the bank statement, which reflects the direct deposit of the 2022 tax refund on February 21, 2023, issued by the Puerto Rico Treasury Department.
3. The Debtor respectfully submits to the Court that she needs to use these funds to pay for: car repairs expenses in the sum of \$1,500.04. Attached is copy of car repairs estimates/invoice.
4. The Debtor will pay to the Trustee the unused portion or balance in the sum of \$43.60 to fund her confirmed Plan.
5. The Debtor needs to use the funds from the 2022 "tax refund" to pay for this reasonable expense. Furthermore, the Debtor is living within a very "tight" budget which barely covers her living expenses and a Plan payment of \$188.00.

6. Based on the above-stated, the Debtor respectfully requests this Court to Order the authorization of the use of these funds for this expense.

WHEREFORE, the Debtor, through the undersigned attorney respectfully requests that this Honorable Court grant the foregoing motion and allow the use of the funds from the 2022 tax refund by the Debtor in the above captioned case.

NOTICE: Within fourteen (14) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006 (f) if you were served by mail, any party against whom this paper has been served, or any other party to the action that objects to the relief sought herein shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

I CERTIFY that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF system which will send notice of same to the Chapter 13 Trustee; I also certify that a copy of this motion was sent via US Mail to Debtor Luz Carmarie Rodriguez Figueroa, to the address of record: Bo Palo Seco Buzon 207, Maunabo PR 00707.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 13th day of March, 2023.

/s/Roberto Figueroa Carrasquillo
RFIGUEROA CARRASQUILLO LAW OFFICE PSC
USDC 203614
ATTORNEY for the DEBTOR
PO BOX 186
CAGUAS PR 00726-0186
TEL 787-744-7699/ 787-963-7699
EMAIL: rfc@rfigueroalaw.com

Centro de Inspección HM 080 • Carr. 759 Km. 0.8 de Maunabo a Palo Seco
Mecánica en General • Diagnóstico de Sistema Fuel Injection
Limpieza de Inyectores • Reparación Tren Delantero

3676

Fecha 21 Marzo/23

Nombre Luz C Rodriguez Figueroa

Dirección _____

Marca Toyota Rav 4 Tablilla _____ Teléfono (934) 779-7952

Trabajo a realizarse:

Reemplazar Tren deantero

Autorizo al taller a usar el vehículo en cualquier momento mientras esté probando dicho vehículo y de no efectuar el pago de dicho arreglo autorizo al taller a quedarse con el vehículo hasta efectuarse el pago correspondiente.

Firma Dueño

OMG

Firma Dueño Taller

Emil Auto Repair

Desperfecto:

Estimado

DETALLE DE GASTOS	
Piezas	Total
4 Terminales	46.00
2 Platos con Buj	104.00
2 Caja Bujas	56.00
2 Bajos Front	54.00
2 Bot Kit	84.00
2 Shock Front	125.00
2 Link front	16.00
2 B/Burra front	6.00
1 Burra Rear Curva	49.00
Sub-Total	535.20
Mano de Obra	480.00
TOTAL	965.20



PIEZAS PARA AUTOS JAPONESES, AMERICANOS Y EUROPEOS
MATERIALES DE HOJALATERIA
Carr. 3 Km 106.5 Bo. Calzada Sector Batey Maunabo, PR 00707
"Ruta California, al lado del Colegio Adventista"
centropiezasmaunabo@gmail.com

Estimado
 Cash
 Crédito

Fecha 1 Marzo 2023

Nombre Estimado

Dirección

Marca TOYOTA Modelo RH4 Año 1996 Tablilla

CANT.	ARTICULOS	PRECIO
4	Terminales	46.00
2	Platos con B Joint	104.00
2	Caja Bolas	56.00
2	Bujes front	54.00
2	Ret. Kit tw	24.00
2	shock front	125.00
2	link front	16.00
2	3 Barra front	6.00
1	Barra Rear Curva	49.00
		480.00
		415.55.20
		<u>535.20</u>

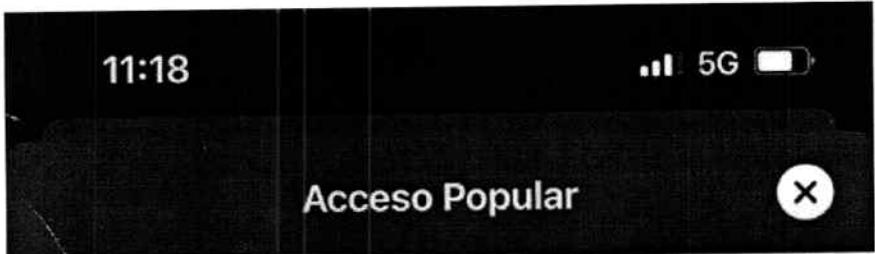
ERRORES DE COSTOS PODRAN SER CORREGIDOS
AL MOMENTO DE RECOGER LA MERCANCIA.
GARANTIAS NO SON TRANSFERIBLES.
PIEZAS ELECTRICAS NO TIENEN GARANTIA.
PIEZAS CORRECTAMENTE DESPACHADAS Y PEDIDOS
ESPECIALES NO TIENEN DEVOLUCIONES.
NUESTRAS CUENTAS VENCEN A LOS 30 DIAS

Sub-total	
IVU +	
TOTAL	

FIRMA

TELÉFONO

19-05439



GULF MAUNABO SERV STA -\$23.00
18 DE FEBRERO DE 23

/ OTHER TRANSACTIONS \$1,544.00

ESTADO CORRIENTE

ATH MOVIL 3670 \$65.00
17 DE FEBRERO DE 2023

ATH MOVIL 0940 -\$65.00
17 DE FEBRERO DE 2023

PIZZERIA MI SUENO INC -\$19.26 >
17 DE FEBRERO DE 2023

GULF PALO SECO SERV STA -\$10.00 >
17 DE FEBRERO DE 2023

ATH MOVIL 5929 -\$40.00
16 DE FEBRERO DE 2023

ATH MOVIL 1001 -\$22.02
16 DE FEBRERO DE 2023

PUMA RUIZ SERVICE STAT -\$20.00 >
16 DE FEBRERO DE 2023

RODRIGUEZ MINI MARKET -\$15.85 >
16 DE FEBRERO DE 2023

ATH WITHDRAWAL 5590
BPPR MAUNABO -\$10.00 >
14 DE FEBRERO DE 2023

ATH WITHDRAWAL 5591